

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

-v-

ANDREY KOSTIN et al.,

Defendants.

Case No. 1:24-cr-00091 (GHW)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Vadim Wolfson's Motion to Modify Filter Team Procedures and for Injunction Against Release or Review of Records Pending Ruling, the Declaration of David C. Rybicki, dated April 16, 2024, and all other papers and proceedings herein, Defendant Vadim Wolfson will move this Court, before the Honorable Gregory H. Woods, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, on the date and time to be set by the Court, for an Order Modifying Filter Team Procedures and for Injunction Against Release or Review of Records, and granting Defendant Vadim Wolfson such other fair and equitable relief as may be appropriate.

Dated: April 16, 2024

/s/ David C. Rybicki

David C. Rybicki
Michael C. Harper
Robert S. Silverblatt
K&L Gates LLP
1601 K Street, N.W.
Washington, DC 20006
Telephone: (202) 778-9370
Facsimile: (202) 778-9100
David.Rybicki@klgates.com

Counsel for Defendant Vadim Wolfson